SFUND RECORDS CTR 2347858

# PRELIMINARY ASSESSMENT REASSESSMENT

Site: Oil Operators, Incorporated

(former)

714 W. Baker Street Long Beach, California

Site EPA ID Number: CAD 983 566 399

PA/SI Cooperative Agreement #: V-999-252-01-0

Submitted to: Rachel Loftin

Superfund Project Officer for

California

USEPA Region IX

Date: August 1, 1996

Prepared by: Jess Villamayor

Hazardous Substances Engineer

Cal/EPA

Review and Concurrence: Greg Holmes

Site Evaluation Program, Unit Chief

Cal/EPA, DTSC

#### 1.0 INTRODUCTION

The U.S. Environmental Protection Agency (USEPA), Region IX, under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), has tasked California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) to conduct a Preliminary Assessment Reassessment (PA Reassessment) of the former Oil Operators, Incorporated - North property (Site) located at 714 West Baker Street, in the City of Long Beach, County of Los Angeles, State of California.

The Site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on April 1990 with EPA identification number CAD 983 566 399. The Site was entered into CERCLIS based on a local citizen's belief that the stained soil he saw at the Site had an odor similar to a chrome plating operation.

A Preliminary Assessment (PA) of the Site was conducted for the USEPA by Ecology and Environment, Incorporated on July 30, 1990. The purpose of the PA was to review existing information on the Site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment, and to determine if further action under CERCLA/SARA is warranted.

Based on the information contained in the PA, the USEPA decided in September 1990 that further investigation would be necessary to more completely evaluate the Site using the USEPA's Hazard Ranking System (HRS) criteria. A high priority Screening Site Inspection (SSI) was originally recommended to be conducted at the Site. After further reviewing the updated site findings, the USEPA determined in June 1996 to complete the PA Reassessment stage of evaluation instead.

The HRS assesses the relative threat associated with actual or potential releases of hazardous substances at the Site. The HRS has been adopted by the USEPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on the National Priorities List (NPL). The NPL identifies sites at which the USEPA may conduct remedial response actions.

The scope of the PA Reassessment includes the review of information available from federal, state, and local agencies and performance of a site reconnaissance visit. This report summarizes the results of the PA Reassessment of the Site.

#### 1.1 APPARENT PROBLEM AND PREVIOUS INVESTIGATIONS

On October 1989, Oil Operators, Incorporated began a landfarming bioremediation activity at the Site. During its initial stages of bioremediation activity, neighboring school children and residents reportedly became ill. In addition, a local resident alleged that the stained soil he saw at the Site had an odor similar to a chrome plating operation. This caused the Site to be entered into the CERCLIS database in April 1990.

On August 22 and 26, 1986, a preliminary site characterization study was conducted for the Site by Jaykim Engineers, Incorporated. Twelve boreholes were drilled in and adjacent to the Site. A perched water layer was encountered at 8 feet while drilling borehole No. 4. At the termination of drilling borehole No. 4, the water level had risen to 7 feet. A water sample was obtained for analysis which revealed the presence of the following heavy metals: lead (16 parts-per-million (ppm)), chromium (5.5 ppm), copper (7.3 ppm), nickel (5.5 ppm), zinc (18 ppm). It was not known whether proper groundwater monitoring well development procedures were followed at the time of sampling (2).

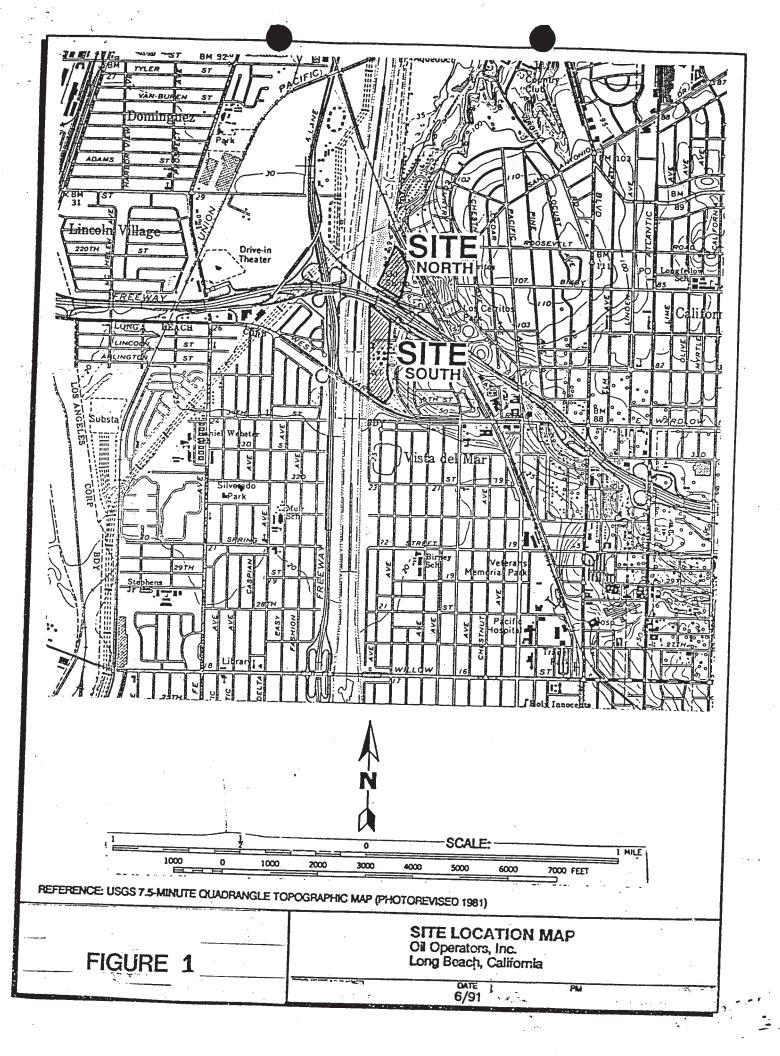
Results of soil sampling analyses shows that heavy metals such as Barium (440 ppm), Chromium (135 ppm), Copper (86 ppm), Lead (690 ppm), Arsenic (44 ppm), Selenium (200 ppm), Zinc (290 ppm); PAHs such as Phenanthrene (18 ppm), 2-methylnapthalene (45 ppm), Naphthalene (8.7 ppm), Dibenzofuran (2.4 ppm), Fluorene (8.1 ppm); and TPH (95 ppm) are present in the soil (1).

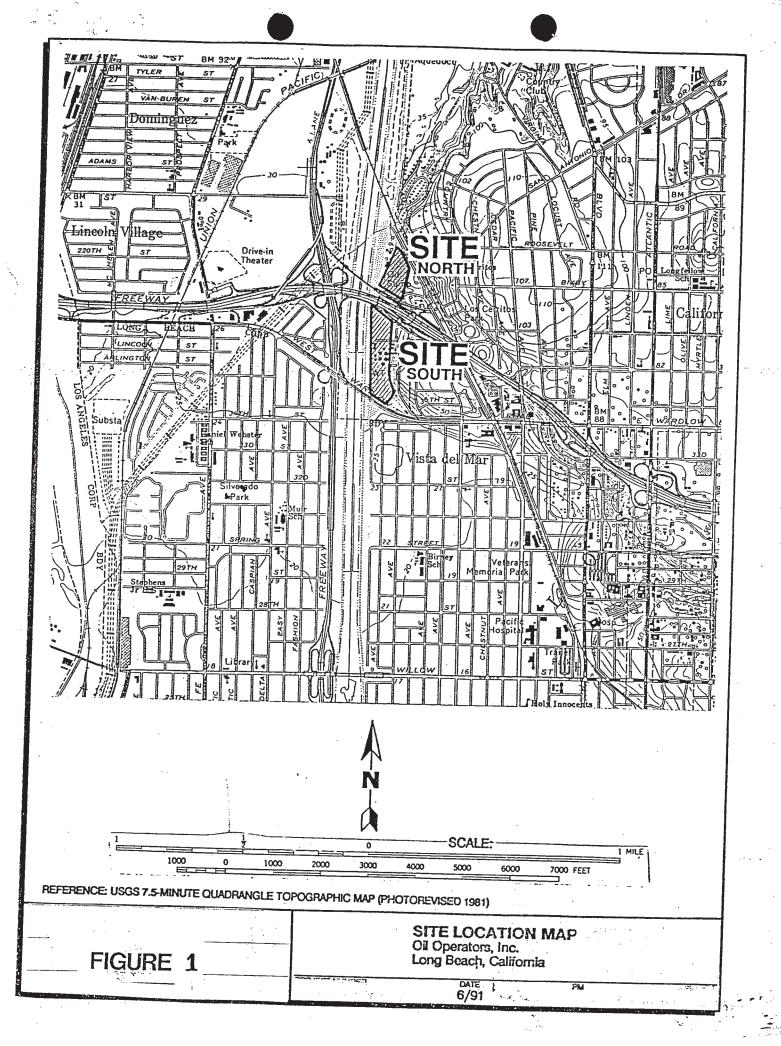
As part of the continuing effort to monitor the groundwater beneath the Site, the LARWQCB issued Waste Discharge Requirements Order No. 87-54 in 1987 for the facility's wastewater treatment discharge in association with bioremediation operations. Several monitoring wells were installed at the North property in 1986 and are sampled on a quarterly basis (1).

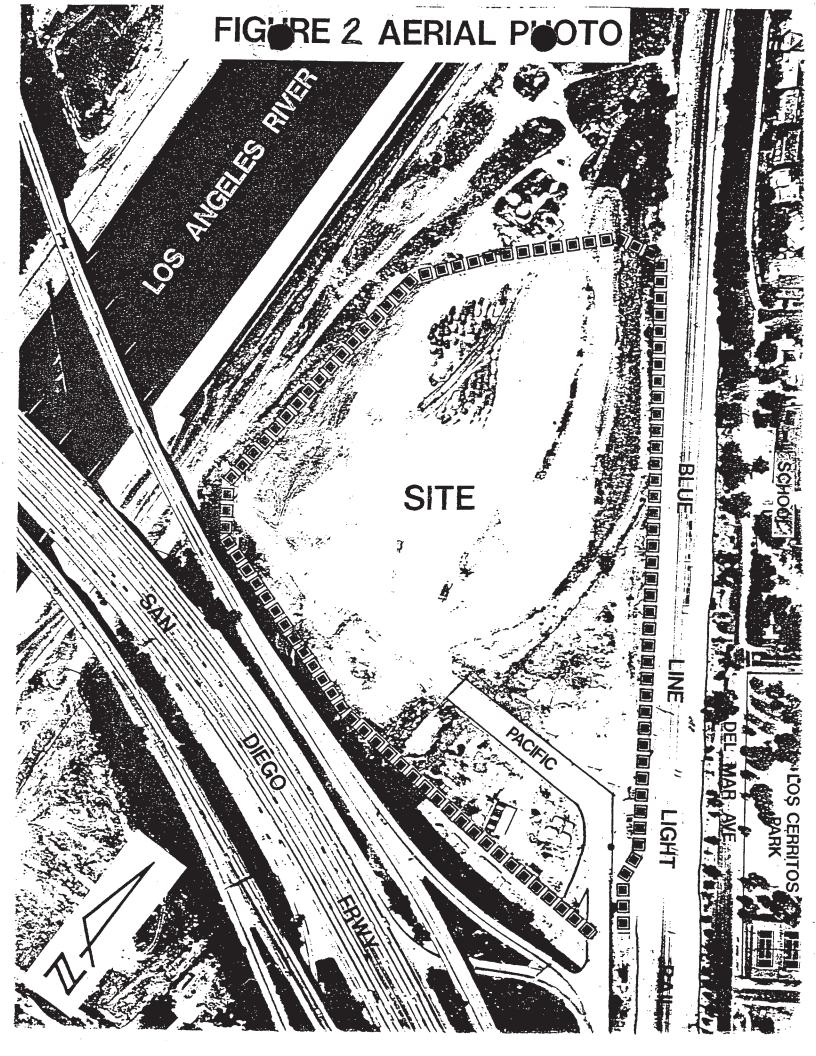
#### 2.0 SITE DESCRIPTION

#### 2.1 Location

Oil Operators Incorporated is comprised of two parcels of real property, the North and South property, which are located in an industrial and residential area of Long Beach near the intersection of San Diego (405) and Long Beach (710) Freeways (Township 4 South, Range 13 West, Section 25; Latitude 33/49/42.0, Longitude 118/11/06.0; Long Beach Quadrangle, 7.5 minute-map). The North property (Site) is a 14-acre property located just north of the 405 Freeway. (See Figure 1, Site Location Map). The Site is currently vacant and is being covered with fresh clean fill of soil. The South property includes an office and a wastewater treatment plant. Both properties are directly adjacent to the eastern edge of the Los Angeles River Flood Control Channel. Five hundred feet from the Site is the Los Cerritos Elementary School. Figure 1 shows the Site location. Figure 2 shows the Site's Aerial Photograph.







#### 2.2 FACILITY PROCESSES/WASTE MANAGEMENT

Oil Operators Incorporated was founded in 1926 as a central brinewater treatment facility serving member oil companies in the Signal Hill/Long Beach area. From 1926 until the mid-1950s, brine from oil drilling was piped to Oil Operators' clay-lined treatment sumps (approximately 35- to 45-feet deep) where water was evaporated from the oil/brine mixture (3). The remaining oil fraction was stored in large aboveground tanks until it was removed by tanker trucks for transport to local refineries. Client companies paid a fee to have their drilling brinewater treated at Oil Operators.

In the mid-1950s, Oil Operators built an on-site water treatment plant at its South property and terminated its oil evaporation operation at the north and south sumps. Oil Operators Incorporated continued its oil/brine treatment operation at its south property.

With the current water treatment plant, oil/brine mixtures are transported to Oil Operators' facility via pipelines where they are circulated through a series of separation and skimming tanks. The oil fractions recovered are placed in tanks while the remaining treated water is stored in an open pond at the South property before being sent to the Long Beach city sewage plant for further treatment. The City of Long Beach regulates the facility's discharge of treated wastewater to the city sewer system.

#### 2.3 CURRENT OPERATIONS

Site reconnaissance conducted by DTSC on May 1996 revealed oil/brine treatment operations are being conducted at the South property. The North property (Site) is currently vacant and is being covered with 6- to 10-feet of soil to be developed into a golf driving range (See Appendix E, Site Reconnaissance Interview and Observations)

#### 2.4 REGULATORY INVOLVEMENT

The Department of Toxic Substances Control (DTSC), under contract to USEPA, performed an initial file search and phone interviews with Federal, State and Local agencies. The following information has been compiled:

<u>United States Environmental Protection Agency (USEPA):</u>
Oil Operators, Incorporated is not listed in the Resource Conservation and Recovery Information System (RCRIS) database, as of December 12, 1994.

<u>CalEPA/Department of Toxic Substances Control (DTSC)</u>: DTSC's review of its file on Oil Operators revealed that the Site is not on DTSC's Standardized Permit and Tiered Permitting Database as of June 1996 (5). Los Angeles Regional Water Quality Control Board:
According to a recent contact with the LARWQCB and review of Oil
Operators' file, the Site is currently under a Waste Discharge
Requirements Order No. 87-54 (Order). Part of the Order is for Oil
Operators to conduct quarterly groundwater sampling and monitoring.
The LARWQCB later amended the Order requiring Oil Operators to
submit an annual groundwater monitoring report (7).

City of Long Beach Health and Human Services Department:
The City of Long Beach Health and Human Services Department has no current involvement at the Site. However, in October 1989, the City issued a Cease and Desist Order due to a report that several children were becoming ill at a neighboring school, allegedly, as a result of bioremediation activity at the Site. The City of Long Beach Department of Planning and Building has approved Oil Operators' application to establish a golf driving range on the 14-acre north property.

#### 3.0 EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415 (b) (2)] authorizes the USEPA to consider emergency response actions at sites which pose an imminent threat to human health or the environment. For the following reasons, a referral to USEPA Region IX's Emergency Response Section does not appear to be necessary:

\* The Site is currently covered with 6- to 10-feet of clean soil.

#### 4.0 SUMMARY OF PA REASSESSMENT ACTIVITIES

The PA Reassessment activities conducted for the Site included data collection regarding hydrogeologic conditions, drinking water sources and population served (8,9), Site reconnaissance, and regulatory agency involvement.

The pertinent Hazard Ranking System factor associated with the Site is:

- Site Reconnaissance conducted by DTSC on May 15, 1996 reveals that the Site is currently covered with 6- to 10-feet of clean soil which eliminates the on-site soil, surface, and air migration pathways.

## · REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Oil Operators Incorporated EPA ID#: CAD 983 566 399
Alias Site Names:
City: Long Beach County or Parish: Los Angels State: CA
Refer to Report Dated: Report type: PA Re-Assessment
Report developed by: CAL/EPA - Dept. of Toxic Substances Control, Jess Villamayor (Proj. Mgr.)
DECISION:
1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:
1a. Site does not qualify for further remedial   1b. Site may qualify for further   RCRA site assessment under CERCLA action, but is deferred to:   NRC (Site Evaluation Accomplished - SEA)
2. Further Assessment Needed Under CERCLA: 2a. (optional) Priority:     Higher     Lower
2b. Activity     PA
Other:
DISCUSSION/RATIONALE:
Report Reviewed, Approved, and Site Section Signature: LN Defen

EPA Form # 9100-3 Rev. 5/93

APPENDIX A REFERENCE LIST

#### APPENDIX A

#### REFERENCE LIST

## Site: Oil Operators, Incorporated (former)

- 1. Ecology and Environment, Incorporated, Preliminary Assessment, Western Exterminator Company, February 21, 1991.
- Site Characterization Study, Jaykim Engineers, Incorporated, October 1986.
- 3. Monitoring Report For Oil Operators, Incorporated As Per Waste Discharge Requirements for Land Treatment Operation, Long Beach (File No. 86-53), April 13, 1987, Jaykim Engineers, Incorporated.
- 4. State of California Department of Water Resources, Bulletin #104, "Planned Utilization of Groundwater Basins of the Coastal Plain of Los Angeles", Section F-F'.
- 5. Department of Toxic Substances Control in-house communication between Mr. Dennis Hostetler of Facility Management Branch/Region 4 and Jess Villamayor regarding Oil Operators, Incorporated, June 19, 1996.
- 6. Communication between Mr. Richard Smith of the City of Long Beach Department of Health and Human Services and Jess Villamayor of the Department of Toxic Substances Control regarding Oil Operators, Incorporated, June 25, 1996.
- 7. Communication between Mr. Jim Ross of the Los Angeles Regional Water Quality Control Board and Jess Villamayor of the Department of Toxic Substances Control regarding Oil Operators, Incorporated, June 11, 1996.
- 8. Mail correspondence between Mr. Diem Vuong of the City of Long Beach Water Department and Jess Villamayor of the Department of Toxic Substances Control regarding Oil Operators, Incorporated, May 3, 1996.
- 9. Communication between Mr. Robert Ellis of the Dominguez Water Corporation and Jess Villamayor of the Department of Toxic Substances Control regarding Oil Operators, Incorporated, May 3, 1996.

## APPENDIX B

PHOTOGRAPHIC DOCUMENTATION

APPENDIX B

Photographic Documentation

Site: Oil Operators, Incorporated (former)

Photo
No. 1
shows
the
Site as
seen
from the
entrance
(See
Figure
2).



Photo
No. 2
shows
the
Los
Cerritos
Park
on the
right,
and
school
on the
left.

Page 1



PAR \* [Oil Operators, Incorporated] \* [08/96]

APPENDIX B
Photographic Documentation
Site: Oil Operators, Incorporated former

Photo
No. 3
shows
heavy
equipment
adding
the
remaining
5-foot
thick
clay
covering.



Photo
No. 4
shows
former
location
of
treatment
sump.



Page 2

APPENDIX C

CONTACT LOG

## APPENDIX C

## CONTACT LOG

Site:

Oil Operators, Incorporated EPA ID: CAD 983 566 399

Name	Affiliation	Phone		Date	Information
Mr. Richard Young	Oil Operators, Incorporated	(310) 6566	436-	04/27/ 96	Schedule of Site Reconnaissance.
Mr. Diem Vuong	Long Beach Water Department	(310) 2300	570 <del>-</del>	05/03/ 95	Groundwater wells information.
Mr. Robert Ellis	Dominguez Water Corporation	(310) 2625	834-	05/03/ 96	Groundwater wells information.
Mr. Richard Smith	Long Beach Department of Health and Human Services	(310) 4128	570-	06/25/ 96	Local agency involvement.
Mr. Richard Young	Oil Operators, Incorporated	(320) 6566	436-	06/25/ 96	Vertical extent of excavation at the time of Landfarming.
Mr. Jack Bryant	Jack Bryant Engineers	(310) 1161	539-	06/25/ 96	1994 Groundwater monitoring data.
Mr. Jim Ross	Los Angeles Water Quality Control Board	(213) 7500	266-	06/11/ 96	Regional Board's involvement at the Site.
Mr. Dennis Hostetler	Department of Toxic Substances Control (DTSC)	(310) 4899	590-	06/27/ 96	DTSC's involvement at the Site.
Mr. Tom Schauppner	M & S Golf Management	(714) 6136	436-	06/27/ 96	Surface gradient of Site as a result of golf field construction.

APPENDIX D
CONTACT REPORTS

#### APPENDIX D

## CONTACT REPORT

AGENCY/AFFILIATION: Oil Operators, Incorporated CODE:							
DEPARTMENT:							
ADDRESS: 712 W. Baker Street CITY: Long Beach							
				TATE: ZIP			
CONTACT(S): Mr. Richard Young	TITLE: Vice- President			PHONE: (310) 436-6566		6-6566	
DTSC PERSON MAKING CONTACT: Jess Villamayor				DATE:	04/	25/96	
SUBJECT: Site Visit							
SITE NAME: Oil Operators, Incorporated			EPA	ID: C	AD 98	3 566 399	

#### **DISCUSSION:**

Richard Young and I agreed that a site reconnaissance/visit from the Department of Toxic Substances Control (DTSC) could be set on May 9, 1996 at 10:00 am. However, Richard Young called DTSC to change the actual date of visit to May 15, 1996 at 10:00 am. DTSC concurred. Richard Young informed Jess that Oil Operators plan to build a golf driving range at its North property. The North property is currently being covered with clean soil.

·		
Contact Concurrence:	Da	ate:

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: City of Department		CODE:				
DEPARTMENT: Water Quality Section						
ADDRESS: 1800 E. Wardlow Roa	d	CITY:	Long B	each		
COUNTY: Los Angeles STATE: ZIP: 90807 California					90807	
CONTACT(S): Mr. Diem Voung	TITL Dire	E: PHONE:			0-2300	
DTSC PERSON MAKING CONTACT: Jo		DATE: 05/03/96				
SUBJECT: Groundwater wells information						
SITE NAME: Western Exterminate Company	EPA	ID: C	AD 98	3 566 399		
		,				

## DISCUSSION:

DTSC wrote a letter to Mr. Diem Vuong requesting groundwater wells information within the 4-mile radius of Oil Operators, Incorporated located at 714 W. Baker Street, Long Beach, California.

On May 13, 1996, DTSC received a document from the City of Long Beach Water Department containing well information requested.

Contact	Concurrence:	Date:	

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: City of Dominguez						CODE:
DEPARTMENT: Dominguez Water Corporation						
ADDRESS: 21718 S. Alameda St	reet	CIT	'Y: I	Doming	uez	
COUNTY: Los Angeles STATE: ZIP: 90810 California					90810	
					NE: 10) 834-2625	
DTSC PERSON MAKING CONTACT: Jo	ess			DATE:	11/	02/96
SUBJECT: Groundwater Wells						
SITE NAME: Oil Operators, Incorporated		EPA	ID: CA	AD 98	3 566 399	

## DISCUSSION:

Jess requested Robert Ellis to provide the Department of Toxic Substances Control (DTSC) with groundwater wells within the 4-mile radius of Oil Operators, Incorporated.

On May 20, 1996, the City of Dominguez Water Corporation responded to DTSC's groundwater wells information request.

Contact Concurrence:	Date:

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: City of	Long	Beac	h			CODE:
DEPARTMENT: Department of Health and Human Services						
ADDRESS: 2525 Grand Avenue CITY: Long Beach						
COUNTY: Los Angeles STATE: Califor						
CONTACT(S): Mr. Richard Smith	TITLE: Hazardous Waste Operations Officer			PHONE: (310) 570-4128		0-4128
DTSC PERSON MAKING CONTACT: Jess Villamayor				DATE:	06/	25/96
SUBJECT: Agency Involvement with Oil Operators, Incorporated						
SITE NAME: Oil Operators, Incorporated			EPA	ID: CA	AD 98	3 566 399

## DISCUSSION:

Richard Smith informed DTSC that to date, the City of Long Beach Department of Health and Human Services has no involvement with the North property after the Landfarming incident which occurred in 1989.

Contact	Concurrence:	•	Date:
0011000	00110011001		Date.

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: Oil Operators, Incorporated CODE:						
DEPARTMENT:						
ADDRESS: 712 W. Baker Street CITY: Long Beach						
COUNTY: Los Angeles STATE: ZIP: 90 California					90806	
CONTACT(S):  Mr. Richard Young  Vice- President			PHONE: (310) 436			6-6566
DTSC PERSON MAKING CONTACT: Jo			DATE:	06/	25/1996	
SUBJECT: Treatment Sump at North Property.						
SITE NAME: Oil Operators, Incorporated		EPA	ID: CA	D 98	3 566 399	

### DISCUSSION:

Richard Young informed Jess that the depth of treatment sump in the North Property is around 35- to 45-feet deep. During the 1989 Landfarming incident, Oil Operators, Incorporated (OOI) had excavated approximately 15- to 20-feet of soil from a small portion of the North property.

Contact	Concurrence:		`	Date:

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: Jack K. Bryant Engineers					CODE:			
DEPARTMENT:					ď		٠	
ADDRESS: 2601 Airport Drive, Suite 310		CITY: Long Beach						
COUNTY: Los Angeles			STATE: Z: California			ZIP: 90605		
CONTACT(S): TITI Mr. Jack Bryant Cons			E: PHONE: (310)				-1161	
DTSC PERSON MAKING CONTACT: Jess Villamayor				DAT	E:	06/2	5/96	
SUBJECT: Groundwater Monitoring Data								
SITE NAME: Oil Operators, Incorporated			EPA	ID:	CAI	983	566	399

### DISCUSSION:

Jack Bryant informed Jess that the 1994 groundwater monitoring data showed a chromium detection of 0.0638 milligrams per liter. Chromium was detected in a sample obtained from groundwater monitoring well #3 which is located on the southern tip of the North property.

Contact	Concurrence:	Date:	

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: Cal/EPA				CODE:		
DEPARTMENT: Los Angeles Regional Water Quality Control Board						
ADDRESS: 101 Centre Plaza Dri	ive	CITY: M	ontere	y Par	:k	
COUNTY: Los Angeles STATE: Califor			ia	ZIP	91754	
CONTACT(S): Mr. Jim Ross	Wate	rvising r urces	TELEF (213		: 6-7500	
DTSC PERSON MAKING CONTACT: Jess Villamayor			DATE:	06/	11/96	
SUBJECT: Oil Operators' North Property						
SITE NAME: Oil Operators, Incorporated		EPA	ID: CA	AD 98	3 566 399	

#### DISCUSSION:

Jim Ross informed Jess that the Los Angeles Regional Water Quality Control Board (LARWQCB) is aware of the Oil Operators plan to cover the North property with top soil. I informed Jim that Oil Operators plans to develop the North property into a golf driving range. He said that Oil Operators is under the Regional Water Quality Control Board's (RWQCB) Waste Discharge Requirements Order No. 87-54 (Order). Under the Order, Oil Operators is required to submit annual groundwater monitoring report. Jim Ross said that RWQCB may require Oil Operators to increase frequency of sampling and monitoring of groundwater in the event that actual golf driving range is built at the North property.

Contact	Concurrence:	Date:

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: Cal/EPA					CODE:		
DEPARTMENT: Department of Toxic Substances Control							
ADDRESS: 245 W. Broadway, Suite 350			CITY: Long Beach				
COUNTY: Los Angeles STATE: ZIP: California				90802			
CONTACT(S): Mr. Dennis Hostetler	Haza Subs	PHONE (310 substances scientist			IONE: 310) 590-4899		
DTSC PERSON MAKING CONTACT: Jess Villamayor				DATE:	06/	19/96	
SUBJECT: Agency Involvement.							
SITE NAME: Oil Operators, Incorporated	· · · · · ·		EPA	ID: C	AD 98	3 566 399	

## DISCUSSION:

Dennis Hostetler informed Jess that Oil Operators, Incorporated is not in the tiered permitting database as of June 19, 1996.

Contact Concurrence:	Date:

Site: Oil Operators, Incorporated

AGENCY/AFFILIATION: M & S Golf Management				CODE:			
DEPARTMENT:							
ADDRESS: 3188-A Airway Avenue	е	CITY: Costa Mesa					
COUNTY: Orange	STATE: Californ	STATE: ZIP					
CONTACT(S): Mr. Tom Schauppner	TITL Part		PHONE (714		5-6139		
DTSC PERSON MAKING CONTACT: Villamayor		DATE:	06/2	27/96			
SUBJECT: Surface Gradient at the Proposed Golf Range.							
SITE NA ME: Oil Operators, Incorporated	EPA	ID: CA	AD 98	3 566 399			

### DISCUSSION:

Tom Schauppner informed Jess that the surface gradient on the North property is 2 % fall from northern tip to the southern tip of the property. Water will drain into a sump which in turn drains into the Los Angeles River. Tom said that a 6-mil thick visqueen is spread on top of the former treatment sump.

Contact Concurrence: Date:	
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## APPENDIX E

SITE RECONNAISSANCE INTERVIEW AND OBSERVATION REPORT

#### APPENDIX E

#### SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

prepared by
California Environmental Protection Agency
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, CA 91201

OBSERVATIONS MADE BY: Jess Villamayor

DATE: 05/15/96

SITE REPRESENTATIVE(S) and TITLE(S):

Richard Young, Vice-President Oil Operators, Incorporated Phone: (714) 261-2440

SITE: Oil Operators, Incorporated

714 West Baker Street Long Beach, California

EPA ID: CAD 983 566 399

#### COMMENTS AND OBSERVATIONS:

The Department of Toxic Substances Control (DTSC) conducted a site reconnaissance of the Oil Operators, Incorporated (Oil Operators) Site located at 714 W. Baker Street, City of Long Beach (Site), County of Los Angeles, California on May 15, 1996.

Jess Villamayor arrived at Oil Operators' North property (Property) at around 9:50 a.m. The Property is located near the intersection of San Diego (405) and Long Beach (710) Freeways (See Figure 1, Site Location Map). The weather was somewhat cool with a temperature of about 70°F.

Upon arrival at the Property, Jess observed that the Property is entirely covered with fresh clean fill. At the eastern portion of the Property, a front loader was scooping soil from a mound and spreading the soil evenly on ground surface. A visqueen sheet was spread on what appeared to be the former location of a treatment sump.

At around 10:00 a.m., Richard Young arrived at the Property. Richard informed Jess that Oil Operators plans to convert the Property into a golf driving range. He explained that the entire Property is already covered with 5-feet of clean soil and another 5-feet is currently being added.

## SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT (Cont'd)

Site: Oil Operators Incorporated

Jess requested Richard if he could take a photograph of the Property. Richard granted the request. Jess took several shots. Richard informed Jess that Oil Operators is under the Los Angeles Regional Water Quality Control Board's (LARWQCB) Waste Discharge Requirements Order to implement a groundwater monitoring and reporting program. Richard said that Oil Operators is in compliance with the LARWQCB Order. Jess requested from Richard a copy of their Groundwater Monitoring Report for the Property. Richard provided two (2) copies of Oil Operators' Groundwater Monitoring Report.

Jess left the Property at around 10:20 a.m.